

COMMONWEALTH OF MASSACHUSETTS
UNITED STATES DISTRICT COURT

CIVIL ACTION NO.: 04-11800DPW

ADAM HELFAND, CARON HELFAND,)
AND MITCHELL HELFAND,)
Plaintiffs)
)
v.)
)
THE JOHN DEWEY ACADEMY, INC.,)
THOMAS BRATTER, CAROLE BRATTER,)
KEN STEINER, AND GWENDOLYN)
HAMPTON,)
Defendants)

JOINT SCHEDULING CONFERENCE STATEMENT

All parties except Defendant Gwendolyn Hampton, who has not filed an Answer, hereby certify that they have conferred pursuant to Local Rule 16.1 and agree to the following:

1. Discovery and motions schedule:
 - a. Initial interrogatories and requests for production of documents to be served by 2/1/05; responses to be served by 3/31/05.
 - b. Depositions of fact witnesses shall commence after 4/1/05, and shall be completed by 10/3/05;
 - c. Requests for admissions to be served by 10/3/05;
 - d. If the Plaintiff, Adam Helfand, consents to or is ordered to have a forensic psychological evaluation conducted by the defendants, the parties will simultaneously exchange reports of experts on the issue of psychological damages of Adam Helfand on or before 11/15/05.
 - e. For expert witnesses on all other issues, and if the Plaintiff, Adam Helfand, does not consent or is not ordered to have a forensic evaluation conducted by the Defendants, the Plaintiffs shall provide reports of their expert witnesses by 10/15/05. The Defendants will provide reports of their expert witnesses by 11/15/05.
 - f. Dispositive motions to be served by 1/5/06; oppositions to dispositive motions are due 2/10/06.
 - g. The pre-trial conference to be held on or about 2/17/06.
2. Depositions:
 - a. Each side shall conduct a maximum of ten depositions.
 - b. The parties agree to limit depositions of non-parties to one day.

3. The parties do not consent to referral of the matter to a magistrate at this time, but they will continue to explore this possibility.

Respectfully submitted,
The Plaintiffs,
Adam Helfand, Caron Helfand, and Mitchell
Helfand,
By their attorneys,

/s/ Laurence E. Hardoon
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The Defendants,
The John Dewey Academy, Inc., Thomas Bratter,
Carole Bratter and Kenneth Steiner
By their attorneys,

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